

**Howard Pashman**

Associate

hpashman@pashmanstein.com

Direct: (201) 488-0966



January 12, 2022

**VIA CM/ECF**

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut St.  
Newark, NJ 07101

**Re:     *East Orange Bd. of Educ. & N.J. Sch. Ins. Grp. v. Great Am. Ins. Co.*  
       **No. 2:21-cv-15132-KM-CLW****

Dear Judge Waldor:

This firm represents the Plaintiffs in the above-referenced action. The ongoing surge in COVID cases is creating staffing problems for the Plaintiffs that affect their ability to meet the current discovery deadlines set in the scheduling order filed on October 21, 2021 [ECF 9]. Consequently, the Plaintiffs respectfully request that those deadlines be extended by 60 days. Counsel for Defendant Great American Insurance Co. has consented to this request, which seeks to extend discovery as follows:

<u>Discovery to be completed</u>	<u>Current deadline</u>	<u>Proposed new deadline</u>
All fact discovery	August 1, 2022	October 3, 2022
Motions to add new parties and/or to amend pleadings	March 31, 2022	May 31, 2022
Responses to interrogatories and document requests	January 14, 2022	March 18, 2022
Affirmative expert reports	September 16, 2022	November 18, 2022
Responsive expert reports	November 1, 2022	January 6, 2023
Expert depositions	December 16, 2022	February 7, 2023

Filed with this letter is a proposed amended scheduling order.

Thank you for your continued time and attention to this matter.

January 12, 2022  
Page 2



Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "H. Pashman".

Howard Pashman

Encl.

cc: Counsel of Record (By ECF)